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DANAHER CORPORATION

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

FLORA LEE, an individual;

Plaintiff,

v.

DANAHER CORPORATION, a Delaware  
Corporation and DOES 1 through 50, inclusive,

Defendants.

Case No. 3:25-cv-04107

UNLIMITED JURISDICTION

**DECLARATION OF JENNA GOLD IN  
SUPPORT OF DEFENDANT'S NOTICE OF  
REMOVAL**

[SAN MATEO COUNTY CASE NO. 25-CIV-01776]

Trial Date: None Set  
Date Action Filed: March 4, 2025

**DECLARATION OF JENNA GOLD**

I, Jenna Gold, declare and state as follows:

1. I make this declaration in support of Defendant Danaher Corporation's ("Danaher") Notice of Removal filed in the above-referenced action. I have personal knowledge of the matters set forth below, and, if called upon to testify, I could and would do so competently.

2. I am currently employed as the Vice President, Corporate Human Resources for Danaher. I have been employed by Danaher or one of its operating subsidiaries for four years and in my current position with Danaher for approximately 1 year and 7 months.

3. In my position, I have knowledge of and access to information and data related to both Danaher's personnel records, corporate structure, and corporate operations.

4. This declaration is based on my personal knowledge and on business records created and maintained by Danaher, in the regular course of business close in time to the events indicated. With respect to those business records, the entries are made in a timely manner by people with knowledge of the information, and it is the regular practice of Danaher's business to maintain such records. In my position, I have access to all of the personnel information that is included in this declaration. If called upon to testify as to the facts set forth in this declaration, I could and would competently testify to them.

5. At all times during her employment, Ms. Lee was employed by Danaher as a remote employee working from her home in California. Based on my review of the wage and personnel records of Ms. Lee, she was employed by Danaher, within the State of California, from approximately February 7, 2022 to February 1, 2024. According to our records, Ms. Lee has been a resident of California throughout her employment. Ms. Lee's home address on file with Danaher is within the State of California. There are no documents in Ms. Lee's personnel file to suggest in any way that she is currently, or during the period of her employment was, a resident or citizen of any state other than California.

6. Danaher's wage records indicate that Ms. Lee's base salary when her employment ended on February 1, 2024 was \$232,132.50 per year. She received a bonus for the 2023 calendar year of \$25,349.

7. In my position, I have knowledge of and access to the corporate information that is included in this declaration.

a. Danaher is and was at all relevant times during Ms. Lee's employment, a corporation incorporated/organized under the laws of Delaware.

b. Danaher's principal place of business is Washington, D.C. Danaher's corporate headquarters is located in Washington, D.C., where high level officers direct, control, and coordinate its activities. Additionally, most of Danaher's executive and administrative functions are performed in or directed from its Washington, D.C. office, including corporate finance, accounting, human resources, and purchasing. Danaher executives have offices in, and regularly work from, these headquarters where they make significant corporate decisions and set company-wide policy and procedures.

I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct.

Executed on this 12<sup>th</sup> day of May, 2025, at 2200 Pennsylvania Avenue, NW Washington D.C. 20037.



JENNA GOLD